EB Docket No. 06-119
RE: Recommendations Of The Independent Panel
Reviewing The Impact Of Hurricane Katrina
On Communications Networks

Comments
Submitted by

Robert Hejl W2IK
PO Box 6731
San Antonio, Texas 78209

## My Background

Experienced communicator with deployment experience as a first responder during the World Trade Center Disaster ("Ground Zero"), Flight 800 event, "LI Storm of the Century", LI Wildfires, OES during hurricanes Bob, Iniki and Andrew, Y2K, New England Ice storms, search and rescue communications, ex-AEC, Red Cross Shelter manager, Red Cross damage assessment, etc.

## Review And Comments On Notice Of Proposed Rulemaking

The nature by which we supply our amateur radio emergency communications support during an event such as Katrina has shown that because of increased migration of populace to reside in coastal areas, and supported fragile infrastructures needed to deal with the additional population, a new look is required and new a philosophy needs to be implemented to deal with threats to coastal communities. The "patchwork principle" which we have used in the past to address these growing concerns have once more proven to be less than fruitful. It is my firm belief that we, as communications support personnel, need a greater lease to better serve our communities. There are several voids and weaknesses which need revamping. There are also several limitations as imposed by the FCC which need to be addressed in order to promote the safety of life and property.

## Support and Training

The FCC has restricted the use of "on air" training by a group of communicators who need to better prepare by using on air training tactics. I am referring to PART 97.407E which restricts RACES (Radio Amateur Civil Emergency Service) to only 1 hour per week of training. This restriction doesn't allow for adequate RACES "deployment drills." This type of drill practice is needed so RACES personnel can practice remote deployment techniques coupled with on air training procedures. I would suggest that the FCC remove this outmoded restriction and leave training time to be determined by local RACES training personnel.

Another FCC restriction which has held back volunteer communicators from deploying under the RACES formula is listed under PART 97.407A which prohibits RACES membership unless communicators are officially enrolled. In the case of an event such as Katrina, we need to bring reform to this section. It is my suggestion that during an event such as Katrina there can be issued a "Limited Emergency RACES Enrollment via a Declared Emergency". This will reduce the need for time consuming applications, paperwork and approval, thereby getting communicators out to service without a long delay. When the declared emergency is over, the RACES membership will revert to the standard pre-event list. Those communicators approved to work as

a RACES communicator during this limited emergency enrollment should be left to the decision of the local communications officials and RACES radio officers in the affected areas.

### Broaden Declared Communications Emergency Abilities

The FCC should seek a faster alternative in declaring a communications emergency. In doing so, it will allow for a quicker emergency response time during a "like Katrina" event and better communications before any event climaxes. The FCC should empower local officials the ability to declare a communications emergency whenever they declare a state of emergency in their governed area. By this, I mean that if a Governor declares a state of emergency in either his/her state, or a portion thereof, there is also an automatic declared communications emergency in that area. This ability would also be granted to county supervisors, mayors or city managers in the areas they are responsible for. When the declared emergency is over, so would the communications emergency.

### Set Permanent Declared Emergency Communications Frequencies

The FCC and local emergency communications groups need to work together to assign a PERMANENT listing of frequencies, both HF and VHF/UHF, (but mainly VHF/UHF) to be used during a declared communications emergency and make such listings known to the amateur radio community. Cooperation should be used to establish the additional listing of local and regional repeaters owned and operated by radio clubs, groups and individuals to insure reliable communications in an emergency. By using this tactic, communicators will know where to monitor, work and what frequencies to stay off of during declared communications emergencies. These frequencies are above and beyond the regional HF frequencies already announced as NET frequencies.

### Better Understanding Makes For Better Cooperation

Defining emergency communications groups such as ARES and RACES as the only amateur radio communications service groups is a tremendous mistake. The past "lip service" shown towards other groups must cease. Until there is honest, open and complete cooperation among ALL communications groups under the service umbrella there can be no allied communications workings and life and property will suffer. ALL groups which provide amateur radio communications during emergencies must be acknowledged as such and given equal status. It is up to the FCC to direct all amateur radio groups to work towards a common goal, no matter which group was first "on scene". There must be an acknowledged mutual aid agreement that all must adhere to if communications goals are to be met. It is also suggested that all groups train in a common atmosphere with combined drills as to better understand the workings of each organization.

### Readiness Checklist

The recommendation by the panel of a "Readiness Checklist" needs to be exchanged for two such lists, the other being a universal amateur radio emergency communications checklist and make it a reality by means not dictated by special interest groups such as the ARRL (American Radio Relay League). This checklist is a vital base in making sure that communicators are prepared and trained for as many eventualities as can be conceived. There needs to be a committee of seasoned emergency communicators used to develop such a checklist based upon variables such as geographical locations and climate. We need to rely on those who have been out in the field and not the recommendations of any business concern. The development of pre-event supplies and equipment is also essential if there is to be an effective amateur radio communications support service during emergencies.

### First Responder Communications

It is my belief that the panel's recommendations in this matter are too broad and varied in scope to cement any reliable network of communications during the beginning of any event. The K.I.S.S. concept should apply.

The 911 telephone system is still dependent upon fragile in place wiring and switching systems. There needs to be development of portable, off-mains, satellite-based 911 systems which will enable the deployment of short-term 911 only communications equipment. (The system should be a "911 ONLY", and clearly marked as such, as this will prevent abuse by the public) Deploying such a system throughout an affected area will mean that communities and neighborhoods will still be able to place emergency phone calls from a mini-site not far from their home or business. Such a system (in this case a non-"911 Only" system) was used near WTC "Ground Zero" so limited phone service could be maintained. This system was located on a small trailer which had 6 phones for use by first responders. This same concept needs to be employed for 911 phone service for use by the general public in areas without reliable landline service due to natural disasters.

There should also be two RF systems which need to be developed, tested and cached to maintain communications. IP systems are too prone to crashes, require too much specialized equipment and need dedicated training by all support staff. They are also not cost effective. First responders need BASIC voice communications via RF systems which can withstand any onslaught of weather or terrorism and can be easily deployed to any location for prompt use. These systems have proven in the past to be of unequaled reliability. One system should be a VHF/UHF system used in common by all agencies charged with emergency duties. This must included deployable repeaters, trailers, tower systems, antennas, off-mains power and radios. Every public safety group, such as police departments, fire departments, EMS, Red Cross, etc., must be able to intercommunicate at times so as to make better use of resources. In the past there have been problems with out-of-area support groups and non-compatability with various communications systems. During the Long Island wildfires, for example, the many Red Cross ERVs couldn't intercommunicate due to radios locked into different frequencies based upon the different geographical areas form which they were drawn.

A separate secondary system should consist of amateur radio communicators with a cache of portable repeaters, off-mains power sources, antennas and towers to add to their own personal communications equipment. It has been proven time and again that amateur radio communications is one of the most reliable forms of emergency communications during a natural disaster or terrorist event. By enriching both systems the only result can be better and more reliable communications and support for communities. The FCC also needs to relax any restrictions on amateur radio portable repeater deployment for the duration of any declared emergency.

In order to give first responders as much time as possible when there is a need for them to get in contact with their local emergency communications group for a possible "call out", I suggest the development of regional pager systems as a way to alert volunteers that their assistance might be needed. When a pager signals, it should signal with a predetermined radio frequency to monitor for additional instructions or "head count" of possible responders. There are smaller groups who have this existing type of alert system, however, it needs to be expanded to encompass a larger resource base. During the Katrina event there could have been a regional pager alert so communicators along the Texas, Louisiana, Mississippi, Alabama and Florida panhandle coastal areas would have had more time to prepare for the event and monitor their local frequencies for additional information such as the possible call up of out of state communicators who could then be directed where, when and how to deploy to the affected area.